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**RECEIVED**  
In King County Superior Court Clerk's Office

FEB 15 2019

Cashier Section  
Superior Court Clerk

STATE OF WASHINGTON  
KING COUNTY SUPERIOR COURT

IN RE: FRANCHISE NO POACHING  
PROVISIONS

(WESTSIDE PIZZA  
INTERNATIONAL, INC.)

NO.

19-2-04317-2 SEA

WESTSIDE PIZZA  
INTERNATIONAL, INC.  
ASSURANCE OF  
DISCONTINUANCE

The State of Washington (State), by and through its attorneys, Robert W. Ferguson,  
Attorney General, and Rahul Rao, Assistant Attorney General, files this Assurance of  
Discontinuance (AOD) pursuant RCW 19.86.100.

I. PARTIES

1.1 In January 2018, the Attorney General initiated an investigation into Westside  
Pizza International, Inc. ("Westside") relating to its hiring practices.

1.2 Westside is a Washington corporation with its principal office or place of  
business in Westside. Westside is in the business of owning, operating and franchising the  
opportunity to own and operate pizza restaurants.

1.3 For the purposes of this AOD, Westside includes its directors, officers,  
managers, agents acting within the scope of their agency, and employees as well as its  
successor and assigns, controlled subsidiaries, divisions, groups, affiliates, partnerships, and  
joint ventures.





1 IV. ADDITIONAL PROVISIONS

2 4.1 This AOD is binding on, and applies to Westside, including each of its  
3 respective directors, officers, managers, agents acting within the scope of their agency, and  
4 employees, as well as their respective successors and assigns, controlled subsidiaries,  
5 divisions, groups, affiliates, partnerships, and joint ventures, or other entities through which  
6 Westside may now or hereafter act with respect to the conduct alleged in this AOD.

7 4.2 This is a voluntary agreement and it shall not be construed as an admission of  
8 law, fact, liability, misconduct, or wrongdoing on the part of Westside. By entering into this  
9 AOD, Westside neither agrees nor concedes that the claims, allegations and/or causes of action  
10 which have or could have been asserted by the Attorney General have merit and Westside  
11 expressly denies any such claims, allegations, and/or causes of action. However, proof of  
12 failure to comply with this AOD shall be *prima facie* evidence of a violation of  
13 RCW 19.86.030, thereby placing upon the violator the burden of defending against imposition  
14 by the Court of injunctions, restitution, costs and reasonable attorney's fees, and civil penalties  
15 of up to \$2,000.00 per violation.

16 4.3 Westside will not, nor will it authorize any of its officers, employees,  
17 representatives, or agents to state or otherwise contend that the State of Washington or the  
18 Attorney General has approved of, or has otherwise sanctioned, the conduct described in  
19 paragraph 2.2 with respect to the No-Poach Provision in Westside's franchise agreement.

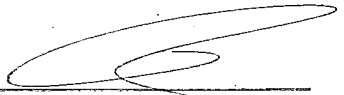
20 4.4 This AOD resolves all issues raised by the State of Washington and the Antitrust  
21 Division of the Attorney General's Office under the Consumer Protection Act and any other  
22 related statutes pertaining to the acts set forth in paragraphs 2.1 – 2.3 above that may have  
23 occurred before the date of entry of this AOD and concludes the investigation thereof. Subject to  
24 paragraph 4.2, the State of Washington and the Antitrust Division of the Attorney General's  
25 Office shall not file suit or take any further investigative or enforcement action with respect to the  
26 acts set forth above that occurred before the date of entry of this AOD.

1 APPROVED ON this \_\_\_\_\_ day of \_\_\_\_\_, 2019.

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4 JUDGE/COURT COMMISSIONER  
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1 Presented by:

2 ROBERT W. FERGUSON  
3 Attorney General

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7 Antitrust Division  
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13 *Attorney for State of Washington*

14 Agreed to and approved for entry by:  
15 WESTSIDE PIZZA INTERNATIONAL, INC.

16   
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WESTSIDE REP

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